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10 *Counsel for Defendant Meta Platforms, Inc.*

11 **UNITED STATES DISTRICT COURT**  
12 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**  
13 **SAN FRANCISCO DIVISION**

14 IRON TRIBE FITNESS, on behalf of itself ) Case No. 3:25-cv-03281-CRB  
15 and all others similarly situated, )  
16 Plaintiff, ) **DECLARATION OF ANDREW YAPHE**  
17 v. ) **IN SUPPORT OF DEFENDANT**  
18 META PLATFORMS, INC., ) **META PLATFORMS, INC.'S**  
19 Defendant. ) **REPLY IN FURTHER SUPPORT OF**  
20 ) **MOTION TO STAY DISCOVERY**  
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1 I, Andrew Yaphe, hereby declare and state as follows:

2 1. I am a counsel at the law firm Davis Polk & Wardwell LLP, attorneys for Defendant  
3 Meta Platforms, Inc. (“Meta”) in the above-captioned matter, and I am admitted to practice in this  
4 Court. I submit this declaration in support of Meta’s Reply in Further Support of its Motion to  
5 Stay Discovery. I have personal knowledge of the facts set forth below, and I could and would  
6 competently testify to the following if called upon to do so.

7 2. On June 30, 2025, counsel for plaintiff sent counsel for Meta a draft joint case  
8 management statement. In that draft, plaintiff proposed a case schedule under which the parties  
9 would substantially complete document productions by October 17, 2025.

10 I declare under penalty of perjury that the foregoing is true and correct.

11 Executed on the 23rd day of July, 2025 in Redwood City, California.

12 */s/ Andrew Yaphe*  
13 Andrew Yaphe

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